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UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEVADA

In re:)	Case No. 09-23702-mkn
)	Chapter 13
)	
Jason and Maya Owens,)	Hearing Date: September 10, 2009
)	Hearing Time: 3:30 PM
Debtor.)	
_____)	

**NOTICE OF HEARING FOR MOTION TO VALUE
COLLATERAL, "CRAM DOWN" AND MODIFY RIGHTS OF THE
SECURED LENDER PURSUANT TO 11 U.S.C. § 506(a) AND § 1322**

TO: ALL INTERESTED PARTIES, CREDITORS AND TRUSTEES

The Court, the Debtor, the Chapter 13 Trustee, and all creditors and parties in interest are hereby notified of a hearing on the Debtor's Motion to Value Collateral, "Cram Down" and Modify Rights of Secured Creditor Pursuant to 11 U.S.C. § 506(A) and § 1322.

Take further notice that any party who objects to the Debtor's Motion to Value Collateral, "Cram Down" and Modify Rights of Secured Creditor Pursuant to 11 U.S.C. § 506(A) and § 1322:

Oppositions to a motion must be filed and service must be completed on the movant no later than 15 days after the motion is served except as provided by LR 3007(b) and LR 9006. If the hearing has been set on less than 15 days' notice, the opposition must be filed no later than 5 business days before the hearing, unless the court orders otherwise. The opposition must set forth all relevant facts and any relevant legal authority. An

1 opposition must be supported by affidavits or declarations that conform to
2 the provisions of subsection (c) of this rule.

3 If an objection is not timely filed and served, an order for the aforementioned motion and
4 request for relief may be granted. LR 9014(a)(1).

5
6 If you object to the relief requested, you must file a written response to this pleading with
7 the court. You must also serve your written response on the person who sent you this notice.

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9 If you do not file a written response with the court, or if you do not serve your written
10 response on the person who sent you this notice, then:

- 11
12 1. The court may refuse to allow you to speak at the scheduled hearing; and
13 2. The court may rule against you without formally calling the matter at the
14 hearing.

15 WHEREFORE, notice is further given that the hearing on said Motion to Value Collateral,
16 "Cram Down" and Modify Rights of Secured Creditor Pursuant to 11 U.S.C. § 506(A) and §
17 1322 will be held before United State Bankruptcy Judge Mike Nakagawa Las Vegas, in the Fo-
18 ley Building, 300 Las Vegas Boulevard South, Courtroom #2, on September 10, 2009, at 3:30
19 PM.
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22 Dated this 3rd day of August, 2009.

23
24 Respectfully Submitted,

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26
27 /s/Samuel A. Schwartz
28 Samuel A. Schwartz, Esq.
29 Nevada Bar No. 10985
30 Nikoll Nikci, Esq.
31 Nevada Bar No. 10699
32 The Schwartz Law Firm, Inc.
33 626 South Third Street
34 Las Vegas, Nevada 89101
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1 Facsimile: (702) 385-2741
2 Attorneys for Debtors

3 **CERTIFICATE OF SERVICE**

4 I HERBY CERTIFY that a true and correct copy of this pleading was sent via US
5 CERTIFIED MAIL on August 3, 2009, to the following:

6 Americas Servicing Co
7 Attention: Bankruptcy
8 1 Home Campus
9 Des Moines IA 50328-0000

10 I HERBY CERTIFY that a true and correct copy of this pleading was sent via US
11 REGULAR MAIL on August 3, 2009, to the following:

12
13 Kathleen Levitt
14 201 S. Las Vegas Blvd Suite 200
15 Las Vegas, NV 89101

16 /s/Sonia Lucero
17 Sonia Lucero
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